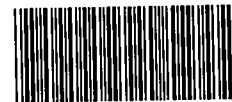




Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066
USA

Mr. Kenneth I. Rose, III
Financial Analyst (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Direct tel: 412-374-5545
Direct fax: 724-940-8508
e-mail: oroszns@westinghouse.com



SDMS DocID 2228541

VIA FEDERAL EXPRESS

**Re: Response to Request for Submission of Information -
Metro Container Site, Trainer Pennsylvania**

May 7, 2012

Dear Mr. Rose:

On or about March 26, 2012, Westinghouse Electric Company LLC ("WEC") received a letter from Region III of the United States Environmental Protection Agency ("EPA") dated March 20, 2012 requesting information ("Information Request") pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act regarding the Metro Container Site ("Site") located in Trainer, Pennsylvania. The Information Request indicated that this letter was sent to WEC due to EPA's belief that WEC sent drums to the Site for reconditioning based information sent in an April 1988 response from "Westinghouse Electric" to EPA's 104(e) Information Request Letter. The "Westinghouse Electric" referenced in the Information Request and that provided information in the April 1988 response was Westinghouse Electric Corporation, not WEC. WEC has no information indicating it has arranged for the treatment, storage or disposal of hazardous substances at the Site and is neither the same company as Westinghouse Electric Corporation nor a successor to the liabilities of Westinghouse Electric Corporation with respect to relevant transactions to the Site. WEC is not a liable party with respect to the Site and has no relevant documents or information related to the Site in response to the Information Request.

WEC is a majority-owned indirect subsidiary of Toshiba Corporation ("Toshiba"), which acquired WEC through a subsidiary in October 2006 from British Nuclear Fuels Limited ("BNFL"). WEC is a Delaware limited liability company. The nature of WEC's business is the providing of services, technology and fuel to the commercial nuclear power generation industry as well as new plant design and construction.

Prior to Toshiba's acquisition, WEC was an indirectly wholly owned subsidiary of BNFL. WEC did not exist prior to 1999. In 1999, BNFL, through a subsidiary, purchased certain of the assets and liabilities of the Energy Systems Business Unit ("ESBU") of CBS Corporation, formerly known as Westinghouse Electric Corporation ("CBS/Westinghouse").¹ The ESBU consisted of the nuclear-related business of CBS Corporation. Non-ESBU assets and liabilities of CBS/Westinghouse were not sold or transferred to BNFL. The BNFL subsidiary that acquired ESBU assets and liabilities subsequently transferred those

¹ Westinghouse Electric Corporation changed its name to CBS Corporation in 1997. CBS Corporation subsequently merged into and became a part of Viacom Inc. Viacom Inc. subsequently changed its name back to CBS Corporation.

assets and liabilities to WEC. Based on information in our possession, we do not believe the ESBU assets and liabilities included any of the businesses, facilities or locations referenced in the Information Request.

We have contacted CBS Corporation, who provided us with a copy of the April 1988 response to EPA's 104(e) Information Request Letter involving the Site. We have reviewed CBS's response, which indicates a "Dutton Mill facility" owned by CBS/Westinghouse purchased empty 55-gallon drums from Metro Container in August 1986 and sent them for disposal to Chemclene Corporation in December 1986. We have no further information on the Dutton Mill facility, but in any event, the information provided in the April 1988 response to the 104(e) Information Request Letter indicates that the transaction did not involve an arrangement for the treatment, storage or disposal of a hazardous substance at the Site.

CBS Corporation also sent us an August 14, 1990 response to a subpoena CBS/Westinghouse received requesting records related to the Site. In CBS/Westinghouse's response, there is mention of a "Westinghouse Lester" facility that allegedly sent two drums to the Site. The Lester Facility was not included among the ESBU assets and liabilities transferred to BNFL. As such, WEC has no liability or information with respect to the Lester Facility or the Site.

We have relied on information from CBS Corporation in responding to this request. The appropriate person for EPA to contact at CBS Corporation regarding this matter is:

William D. Wall, Vice President and Senior Counsel
CBS Law Department
CBS Corporation
20 Stanwix Street, 10th Floor
Pittsburgh, Pennsylvania 15222-1384
(412) 642-3580
william.wall@cbs.com

In summary, WEC did not exist prior to 1999, is unaware of any transactions involving the treatment, storage or disposal of hazardous substances at the Site, and is not a successor-in-interest to any of the companies referenced in the Information Request; therefore, WEC is not a liable party with respect to the Site and does not have any liability for transactions related to the Site.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,
Westinghouse Electric Company LLC by



Nathaniel S. Orosz, Senior Counsel

cc: William D. Wall (CBS Corporation)
Michael T. Sweeney (Westinghouse)
Michele M. Gutman (Westinghouse)